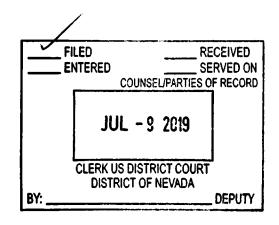
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AARON D. FORD 1 Attorney General IAN CARR, Bar No. 13840 2 **Deputy Attorney General** State of Nevada 3 Public Safety Division 100 N. Carson Street 4 Carson City, Nevada 89701-4717 Tel: (775) 684-1259 5 E-mail: icarr@ag.nv.gov 6 Attorneys for Defendants Adam Brendel, John "James" Buchanan, 7 Timothy Howard and William Miller 8 9



UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS JENSEN,

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v.

Plaintiff,

ADAM BRENDEL, et al.,

Defendants.

Case No. 3:16-cv-00407-MMD-CBC

OR DER

MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

(Second Request)

Defendants, Adam Brendel, John "James' Buchanan, Timothy Howard and William Miller (Defendants), by and through counsel Aaron D. Ford, Attorney General of the State of Nevada, and Ian Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File a Reply in Support of the Motion for Summary Judgment. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request a thirty (30) day extension of time out from the current deadline (July 8, 2019) to file a reply brief in support of the pending defense motion for summary judgment in this case. Defense counsel is confronted with numerous competing deadlines and a high workload due to staffing changes in the Office of the Attorney General. However, such obstacles are currently being resolved and the

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requested extension of time should afford Defendants adequate time file a reply brief supporting the motion for summary judgment in this case.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will allow for more thorough briefing to narrow or eliminate issues prior to further proceedings. The requested thirty (30) day extension of time should permit Defendants time to file a reply brief in support of the pending defense motion for summary judgment. Defendants assert that the requisite good cause is present to warrant the requested extension of time.

For these reasons, Defendants respectfully request a thirty (30) day extension of time from the current deadline to file a reply brief in support of the summary judgment motion, with a new deadline to and including Wednesday, August 7, 2019.

DATED this 8th day of July, 2019.

AARON D. FORD Attorney General

By:

IAN E. CARR, Bar No. 13840 Deputy Attorney General

Attorneys for Defendants

HT S SO ORDERED.

S.MAGISTRATE JUDGE

DATED: